



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 8, 2016

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan Federal Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: United States v. Jason Galanis et al.,
15 Cr. 643 (PKC)**

Dear Judge Castel:

By order dated March 2, 2016, the Court ordered the Government in the above-captioned matter to provide, by April 8, 2016, “the date by which it expects to complete its Rule 16 discovery, and the production of any presently known *Brady* and *Giglio* material.”

The Government hereby advises the Court that it has completed its production of Rule 16 discovery in this matter.¹ The Government is aware that its duty to disclose Rule 16 material is a continuing one and will promptly disclose any additional Rule 16 material of which it becomes aware. *See* Fed. R. Crim. P. 16(c).

The Government is aware of its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny. The Government has made available all *Brady* material in this matter, and will promptly make available any such material of which it later becomes aware.

The Government is also aware of its obligations under *Giglio v. United States*, 405 U.S. 150 (1972), and its progeny. In keeping with the general practice in this District, and notwithstanding the production of materials noted above, the Government intends to make available any remaining *Giglio* material at the same time that it makes available material required to be produced pursuant to the Jencks Act, which will be sufficiently in advance of trial

in order for counsel for the defendants in this matter to make effective use of such material at trial.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/ Brian R. Blais
Brian R. Blais
Aimee Hector
Rebecca Mermelstein
Assistant United States Attorneys
(212) 637-2521/2203/2360

cc: All counsel of record (redacted version via ECF; unredacted version via email)